

MAR - 8 2004

**510(k) Summary of Safety and Effectiveness** (in accordance to 21 CFR 807.87(b))**Device Name**

Proprietary Device Name : PNM 60.

**Establishment Name and Registration Number of Submitter**

Name: MEDIBELL, MEDICAL VISION TECHNOLOGIES LTD

Registration: 3003809739

Corresponding Official: Dan Laor

MATAM

Haifa, 31905

Israel

**Device Classification**

Classification Code: 86 HKI

Regulation Number: 886.1120

Panel Identification: Ophthalmic

Classification Class: Class II Product

**Reason for 510(k) Submission**

Modification of a legally marketed device. Special 510(K)

**Identification of Legally Marketed Equivalent Devices**

K001111 Panoret 1000A

**Device Description**

The PNM 60 is a modification of the legally marketed Panoret 1000 A K001111 Digital Retinoscope. It is based on transcleral illumination. Its optics distinguishes the illumination path from the imaging path, thus, enables non mydriatic wide angle imaging. The Panoret viewing angle has been changed from (Panoret 1000A) 100 degrees to PNM 60 degrees

**Intended Use of Device**

The PNM 60 is a diagnostic device indicated to provide digital photographs of the interior of the eye as well as the anterior segment and external part of the eye.

**Safety & effectiveness information**

Panoret PNM device is designed to comply with the requirements of the IEC-60601-1 safety standard.

Brightness control: The relative spectral radiant power distribution and the photometric luminance have been changed. The device built-in light controls and the device operation have been adjusted to compensate for the modification.

**Substantial Equivalency**

It is Medibell opinion that the PNM 60 is substantially equivalent in terms of safety and effectiveness to the legally marketed Panoret 1000A K001111.



MAR - 8 2004

Food and Drug Administration  
9200 Corporate Boulevard  
Rockville MD 20850

Medibell Medical Vision Technologies Ltd.  
c/o Dan Laor, General Manager  
MATAM  
Haifa, 31905  
Israel

Re: K040325  
Trade/Device Name: PNM 60  
Regulation Number: 21 CFR 886.1120  
Regulation Name: Ophthalmic camera  
Regulatory Class: Class II  
Product Code: HKI  
Dated: February 5, 2004  
Received: February 17, 2004

Dear Mr. Laor:

We have reviewed your Section 510(k) premarket notification of intent to market the device referenced above and have determined the device is substantially equivalent (for the indications for use stated in the enclosure) to legally marketed predicate devices marketed in interstate commerce prior to May 28, 1976, the enactment date of the Medical Device Amendments, or to devices that have been reclassified in accordance with the provisions of the Federal Food, Drug, and Cosmetic Act (Act) that do not require approval of a premarket approval application (PMA). You may, therefore, market the device, subject to the general controls provisions of the Act. The general controls provisions of the Act include requirements for annual registration, listing of devices, good manufacturing practice, labeling, and prohibitions against misbranding and adulteration.

If your device is classified (see above) into either class II (Special Controls) or class III (PMA), it may be subject to such additional controls. Existing major regulations affecting your device can be found in the Code of Federal Regulations, Title 21, Parts 800 to 898. In addition, FDA may publish further announcements concerning your device in the Federal Register.

Please be advised that FDA's issuance of a substantial equivalence determination does not mean that FDA has made a determination that your device complies with other requirements of the Act or any Federal statutes and regulations administered by other Federal agencies. You must comply with all the Act's requirements, including, but not limited to: registration and listing (21 CFR Part 807); labeling (21 CFR Part 801); good manufacturing practice requirements as set forth in the quality systems (QS) regulation (21 CFR Part 820); and if applicable, the electronic product radiation control provisions (Sections 531-542 of the Act); 21 CFR 1000-1050.

This letter will allow you to begin marketing your device as described in your Section 510(k) premarket notification. The FDA finding of substantial equivalence of your device to a legally marketed predicate device results in a classification for your device and thus, permits your device to proceed to the market.

If you desire specific advice for your device on our labeling regulation (21 CFR Part 801), please contact the Office of Compliance at (301) 594-4613. Also, please note the regulation entitled, "Misbranding by reference to premarket notification" (21CFR Part 807.97). You may obtain other general information on your responsibilities under the Act from the Division of Small Manufacturers, International and Consumer Assistance at its toll-free number (800) 638-2041 or (301) 443-6597 or at its Internet address <http://www.fda.gov/cdrh/dsma/dsmamain.html>

Sincerely yours,

A handwritten signature in cursive script that reads "A. Ralph Rosenthal".

A. Ralph Rosenthal, M.D.

Director

Division of Ophthalmic and Ear,

Nose and Throat Devices

Office of Device Evaluation

Center for Devices and

Radiological Health

Enclosure

510(k) Number (if known): K040325

DEVICE NAME:

INDICATION FOR USE: The PNM 60 is a diagnostic device indicated to provide digital photographs of the interior of the eye as well as the anterior segment and external part of the eye.

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( Concurrence of CDRH, Office of Device Evaluation (ODE) )

Dennis L. McCarthy

(Division Sign-Off)

Division of Ophthalmic Ear,  
Nose and Throat Devices

510(k) Number K040325

Prescription Use ✓  
(Per 21 CFR 801.109)

OR Over-the-Counter Use \_\_\_\_\_